

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SYMBOLGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:16-cv-00450-JRG
	§	
vs.	§	LEAD CASE
	§	
CITIBANK N.A.	§	
	§	
Defendant.	§	
	§	
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SYMBOLGY INNOVATIONS, LLC	§	
	§	
Plaintiff,	§	Case No: 2:16-cv-00601-JRG
	§	
vs.	§	CONSOLIDATED CASE
	§	
PIONEER ELECTRONICS (USA), INC.	§	
	§	
Defendant.	§	
	§	
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**JOINT MOTION TO DISMISS**

WHEREAS, Plaintiff Symbolgy Innovations, LLC (“Plaintiff”) and Defendant Pioneer Electronics (USA), Inc. (“Defendant”) have resolved Plaintiff’s claims for relief against Defendant asserted in this case.

NOW, THEREFORE, Plaintiff and Defendant through their attorneys of record request this Court to dismiss Plaintiff’s claims for relief against Defendant with prejudice and with all attorneys’ fees, costs of court and expenses borne by the party incurring the same.

Dated September 1, 2016

Respectfully submitted,

/s/ Jay Johnson

Jay Johnson  
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SYBOLOGY INNOVATIONS, LLC**

Respectfully submitted,

/s/ Daniel Foster

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**ATTORNEY PIONEER ELECTRONICS  
(USA), INC.**

**CERTIFICATE OF CONFERENCE**

The undersigned certifies that on September 1, 2016 he met and conferred with counsel for Defendant concerning this motion and that Defendant's counsel agreed to the motion.

/s/ Jay Johnson

Jay Johnson

**CERTIFICATE OF SERVICE**

The undersigned certifies that all counsel of record who have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on September 1, 2016.

/s/ Jay Johnson

Jay Johnson